## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, et al.,

Plaintiffs,

v.

Case No. 1:23-cv-10511-WGY

JETBLUE AIRWAYS CORPORATION and SPIRIT AIRLINES, INC.

Defendants.

GABRIEL GARAVANIAN, et al.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION and SPIRIT AIRLINES, INC.

Defendants.

Case No. 1:23-cv-10678-WGY

# NON-PARTY UNITED AIRLINES, INC.'S UNOPPOSED MOTION TO INTERVENE FOR THE LIMITED PURPOSE OF PARTIALLY OBJECTING TO THE PROPOSED PROTECTIVE ORDER

Non-party United Airlines, Inc. ("United") moves, pursuant to Federal Rule of Civil

Procedure 24 and on the basis of the reasons set forth in the accompanying Memorandum of

Law, to intervene for the limited purpose of objecting partially to the Joint Motion for Entry of

Stipulated Joint Protective Order and Order Governing Production of Investigation Materials.

Counsel for all parties have stated that they do not object to this Motion to Intervene. They have

not been asked to and have not taken any position as to United's Partial Objection to the Joint

Motion for Entry of the Protective Order that is also filed herewith.

#### **REQUEST FOR ORAL ARGUMENT**

United respectfully requests oral argument on its Partial Objection to the Joint Motion for Entry of Protective Order. It does not request argument on this Motion to Intervene itself.

Dated: June 5, 2023 Respectfully submitted,

/s/ John J. Falvey, Jr.

John J. Falvey, Jr. (BBO No. 542674)

#### GOODWIN PROCTER LLP

100 Northern Avenue

Boston, Massachusetts 02210

Tel.: (617) 570 1000 Fax.: (617) 523 1231

jfalvey@goodwinlaw.com

Julie Elmer (pro hac vice)
Mary Lehner (pro hac vice)
EDECHEIELDS EDUCKHAUS DEL

# FRESHFIELDS BRUCKHAUS DERINGER US LLP

700 13th Street, NW, 10th Floor Washington, District of Columbia 20005

Telephone: 202 777 4500 Facsimile: 202 777 4555

Attorneys for United Airlines, Inc.

## **LOCAL RULE 7.1(a)(2) CERTIFICATE and CERTIFICATE OF SERVICE**

I, John J. Falvey, Jr., certify that my firm conferred with counsel for Plaintiffs and Defendants regarding the foregoing requested relief and counsel have advised that they do not oppose this Motion.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the non-registered participants as known this June 5, 2023.

/s/ John J. Falvey, Jr.